

REMARKS

Initially, Applicants would like to thank the Examiner for the most recently issued Official Action dated April 9, 2008. This Response traverses the rejection of claims 1-16 which have been rejected under 35 U.S.C. § 102 (b), as being anticipated by ROWETT et al., U.S. Patent 5,991,817.

Applicants' Claimed Invention

Applicants' claims 1-16 are directed to a method (claims 1-8) and a system (claims 9-16) for integrated processing of different network protocols and multimedia traffic, and multiple channel processing by allocating various kinds of packets to each channel and processing them on a channel-by-channel basis. The claimed system and method preferably relate to digital consumer devices that are used in building networks including home networks. The present invention is particularly well suited for converting multimedia data from either external or internal networks into a common packet and for performing integrated processing. One of the primary objectives and advantages of the present invention, therefore, is to rapidly process mass data by allocating various kinds of data to each channel and processing the data on a channel-by-channel basis.

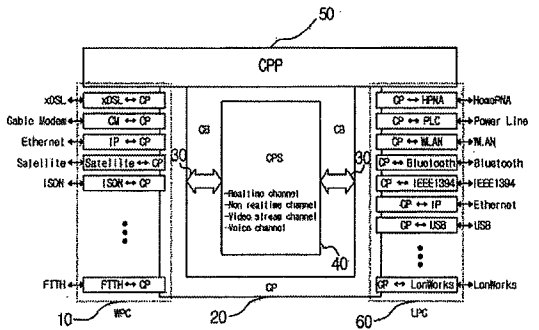
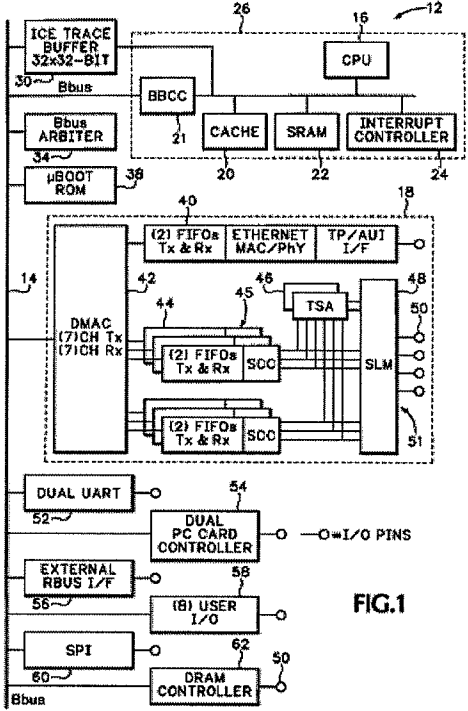
ROWETT et al's Disclosure

The disclosure of ROWETT et al., however, relates to a complete router architecture, which is integrated onto a single silicon chip and which includes an internal bus that couples multiple channels to a central processing unit. ROWETT et al. discloses that one of the main objectives and advantages of their method and system is to reduce the overall cost of the router and to provide a variety of different network systems and

peripheral interfaces by providing a complete router architecture which is integrated onto a single silicon chip.

Differences Between Independent Claims 1 and 9 and ROWETT et al.

There are substantial differences between the present invention of independent claims 1 and 9 and the teachings of ROWETT et al., as summarized in the table shown below:

Applicants' Features of Independent Claims 1 and 9	Features Not Disclosed or Functionally Different in ROWETT et al.
<p>Fig. 1</p>  <p>Exemplary Fig. 1 of the Application</p>	 <p>Exemplary Fig. 1 of ROWETT et al.</p>
<p>“common packet” (CP)</p>	<p>Not disclosed (functionally different routing information included in a packet header)</p>
<p>“common packet switch” (CPS)</p>	<p>Functionally different Router, DMAC, CPU</p>

“plurality of channels”	Functionally different multiple channels
“common bus” (CB)	Functionally different Bbus, Rbus, Abus
“common protocol platform” (CPP)	Not disclosed (functionally different router, CPU)
“external protocol converter” (WPC)	Not disclosed (functionally different CPU)
“internal protocol converter” (LPC)	Not disclosed (functionally different CPU)

The claimed “common packet” of independent claims 1 and 9 of the present invention can, for example, be a datagram having a uniform length so as to enable integrated processing of various types of external and internal network datagrams and to enable efficient exchange of data. All external and internal network datagrams of the present invention are converted into the “common packet” by either the “external protocol converter” or “internal protocol converter”. The data packet of ROWETT et al., however, is examined for a packet header having routing information of the packet to determine the destination for the packet, and there is no process for converting the data packet of ROWETT et al. into a common packet for integrated processing. In other words, in the present invention, the data packet from either an external or internal network is converted into the “common packet” having a common packet structure compatible with all packets processed through the protocol conversion devices (WPC and LPC). On the other hand, in ROWETT et al., the data packet includes routing information in a packet header, and the packet header is examined to determine whether the route for the data packet is known. Accordingly, ROWETT et al. fails to disclose the claimed “common packet”, “external protocol converter” and “internal protocol converter”.

The plurality of channels of independent claims 1 and 9 are substantially different from the channels of ROWETT et al. The “channelizing” of claim 1 or “plurality of

channels” of claim 9 include “dedicated lines according to types of packets”. In other words, channels include packets corresponding to traffic classes, such as an Internet data channel, an audio channel, etc., and the various kinds of packets are allocated to each channel. On the other hand, ROWETT et al. discloses TDM channels which are configured to operate with a variety of data formats. See, the Abstract of ROWETT et al. Accordingly, it is respectfully submitted that ROWETT et al. does not disclose the claimed channel allocation having the “channelizing” of claim 1 or “plurality of channels” of claim 9 which include “dedicated lines according to types of packets”.

The claimed “common protocol platform” of independent claims 1 and 9 functions with various network protocols to perform integrated processing of various types of data from different networks. For example, the network protocols may include protocols for switching and routing, protocol conversion, address conversion, traffic priority, scheduling, security, QoS and multicasting. The router of ROWETT et al., however, does not perform the function of Applicants’ claimed “common protocol platform”. Instead the CPU of ROWETT et al. examines a packet header for routing information and decides whether the route for the data packet is known. If the route for the packet is unknown, the CPU runs a routing algorithm to determine the destination for the packet. Accordingly, there is no disclosure of any claimed “address translation” which enables the “common protocol platform” to perform the integrated processing of data from different networks and different packet formats.

In summary, there are numerous significant structural and functional distinctions between independent claims 1 and 9 and the system and method of ROWETT et al. ROWETT et al. does not disclose the claimed “external protocol converter” and “internal protocol converter” that convert received packets into “common packets”. ROWETT et al. also does not disclose the claimed “plurality of channels” which are allocated to dedicated lines according to types of data to be transmitted. ROWETT et al. further does not disclose the “common protocol platform” which performs conversions that enable integrated processing of different networks and different packet formats. For at least each of these reasons, Applicants respectfully submit that independent claims 1 and 9 are not anticipated by ROWETT et al., and the Examiner is respectfully requested to withdraw the rejection of independent claims 1 and 9 based upon 35 U.S.C. 102(b).

Dependent Claims 2-8 and 10-16

Dependent claims 2-8 and 10-16 depend either directly or indirectly from independent claims 1 or 9, which Applicants respectfully submit are now in condition for allowance. Accordingly, Applicants believe that dependent claims 2-8 and 10-16 are in condition for allowance for at least the same reasons as independent claims 1 or 9, as well as based upon their additional recitations.

Conclusion

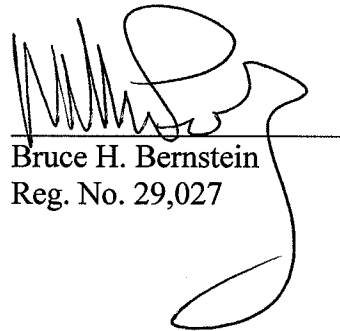
In view of the herein contained remarks and arguments, Applicants respectfully request reconsideration and withdrawal of each of the objections and rejections set forth in the Office Action of April 9, 2008, together with an indication of the allowability of all

pending claims, in due course. Such action is respectfully requested and is believed to be appropriate and proper.

Should an extension of time be necessary to maintain the pendency of this application, the Commissioner is hereby authorized to charge any additional fee to Deposit Account No. 19-0089.

If the Examiner has any questions or comments regarding this response, or the present application, the Examiner is invited to contact the undersigned at the below-listed telephone number.

Respectfully Submitted,
Kwangmo JUNG et al.

A handwritten signature in black ink, appearing to read 'Bruce H. Bernstein', is written over a horizontal line. The signature is stylized with a large, looping 'B' and a long, sweeping tail that extends downwards and to the right.

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